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March 26, 2025

Via ECF Filing

The Honorable Anne M. Nardacci
United States District Court
James T. Foley United States Courthouse
445 Broadway, Room 509
Albany, New York, 12207

**Re: *United States v. State of New York et al.*,
No. 1:25-cv-205 (AMN) (MJK)**

To the Chambers of the Honorable Judge Nardacci:

I represent the United States in the above-referenced action, which presents Constitutional challenges to a New York State law and seeks declaratory and injunctive relief to prevent further enforcement of the challenged law. The United States filed its Complaint on February 12, 2025. *See* ECF No. 1. On February 27, 2025, Defendants—the State of New York and three of its officials who are each sued in their official capacities—moved this Court for an extension of their deadline to respond to the Complaint to March 25, 2025. The United States did not oppose the requested extension, which the Court granted. Defendants filed a motion to dismiss the Complaint on March 25, 2025.

I write to request a brief extension of the United States' time to respond to Defendants' motion to dismiss through April 25, 2025. The current response deadline is April 15, 2025. This is the United States' first requested extension, which is made in order to allow adequate time to review Defendants' motion and prepare an appropriate response and in light of pressing deadlines in other litigation matters. Defendants do not oppose this request and have in turn requested that their deadline to file a reply in support of their motion to dismiss be extended through May 9, 2025. The United States does not oppose Defendants' request.

Thank you for your attention and consideration of this request.

Respectfully submitted,

/s/ Cristen C. Handley
Cristen C. Handley

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